

## UNITED STATES DISTRICT COURT

## DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
	)
v.	) CRIMINAL NO. 04-10031-WGY
	)
JAMES E. REID	)

MOTION TO CONTINUE TRIAL

Counsel for the defendant, James Reid, respectfully moves to continue the trial in this case. The case is currently set for trial on September 19, 2005. As grounds for this motion, counsel states that her trial commitments in other cases will interfere with her ability to prepare this case adequately for trial in September and that she needs additional time to prepare.

Undersigned counsel has the following cases set for trial: United States v. Matthew Dwinells, #04-10010-PBS, set for July 25, 2005; United States v. Trevis Catron, #04-10108-MEL, set for September 12, 2005; United States v. James Reid, the instant matter, set for September 19, 2005; and United States v. Girard Lafortune, #03-10366-PBS, set for October 17, 2005.<sup>1</sup> Both the Lafortune and Dwinells cases involve charges, inter alia, of possession of child pornography and have complex legal and factual issues.<sup>2</sup> The Catron indictment charges firearm

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<sup>1</sup> Counsel plans to take her summer vacation between August 13 and September 3, 2005.

<sup>2</sup> The Lafortune case is especially demanding; there are multiple pretrial motions for various forms of relief and the charges carry extremely high mandatory minimum sentences.

possession.

The instant case involves a large amount of documentary evidence that counsel has not yet been able to review. Though counsel will begin serious work on this case immediately, she will not be able to devote her undivided attention to it in the coming weeks, given the need to prepare the Dwinells case for trial and to finish motions filing and litigation in the Lafortune case. Mr. Lafortune is in custody.

In light of the foregoing, counsel requests that this matter be reset for trial in mid-December 2005. Counsel has conferred with Assistant U.S. Attorney Victor Wild about this motion for a continuance. Mr. Wild has a multi-defendant trial scheduled for October 17, 2005 that he expects will last several weeks. Therefore, should this court grant a continuance, Mr. Wild's schedule would not accommodate a trial earlier than mid-December. Counsel notes that Mr. Reid is on release. Undersigned counsel would agree to the exclusion of time for Speedy Trial Act purposes as in the interests of justice.

Respectfully submitted,

By his attorney,

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